Page 1 of 3

## EXECUTIVE SUMMARY - ENFORCEMENT MATTER DOCKET NO.: 2007-1600-PST-E TCEQ ID: RN101572444 CASE NO.: 34736 RESPONDENT NAME: INTERGLOBE TRADE CHANNEL, INC. AKA F & H STATION, INC. DBA DOSSANI FOOD MART

ORDER TYPE:					
X 1660 AGREED ORDER	FINDINGS AGREED ORDER	FINDINGS ORDER FOLLOWING SOAH HEARING			
FINDINGS DEFAULT ORDER	SHUTDOWN ORDER	IMMINENT AND SUBSTANTIAL ENDANGERMENT ORDER			
_AMENDED ORDER	EMERGENCY ORDER				
CASE TYPE:					
AIR	MULTI-MEDIA (check all that apply)	INDUSTRIAL HAZARDOUS WASTE			
PUBLIC WATER SUPPLY	LIC WATER SUPPLY  X PETROLEUM STORAGE TANKS  OC				
WATER QUALITY	SEWAGE SLUDGE	UNDERGROUND INJECTION CONTROL			
MUNICIPAL SOLID WASTE	RADIOACTIVE WASTE	DRY CLEANER REGISTRATION			
TYPE OF OPERATION: convenience store  SMALL BUSINESS:X_Yes N  OTHER SIGNIFICANT MATTERS: There facility location.  INTERESTED PARTIES: No one other the COMMENTS RECEIVED: The Texas Regel CONTACTS AND MAILING LIST:  TCEQ Attorney: Ms. Jennifer Community Ms. Lena Robert TCEQ Enforcement Coordinators TCEQ Regional Contact: Mr. Sar Respondent: Mr. Faisal Dossani, I Drive, Lake Dallas, Texas 75065	No	ional pending enforcement actions regarding this terest in this matter.  No comments were received.  73 19 , MC R-4, (817) 588-5825 MC R-4, (817) 588-5903			

shall include post operating instructions at

each fueling point.

#### VIOLATION SUMMARY CHART: CORRECTIVE ACTIONS PENALTY CONSIDERATIONS VIOLATION INFORMATION TAKEN/REOUIRED Corrective Actions Taken: Total Assessed: \$27,430 Type of Investigation: The Executive Director recognizes that the Total Deferred: \$0 Complaint Respondent performed the following corrective X Routine Expedited Order \_\_\_ Financial Inability to Pay actions at the Station: Enforcement Follow-up \_\_ Records Review SEP Conditional Offset Successfully conducted the required piping tightness and line leak detector tests as of Total Paid/Due to General Revenue: Date of Complaint Relating to this Case: August 24, 2007 (violation no. 1). \$970/\$26,460 Submitted an amended registration and The Respondent paid \$970 of the Date of Investigation Relating to this Case: obtained a TCEQ delivery certificate on August August 21, 2007 administrative penalty. The remaining amount 24, 2007 (violation nos. 3 and 4). of \$26,460 shall be payable in 35 monthly payments of \$756 each. Date of NOE Relating to this Case: 3. Provided the TCEO Dallas/Fort Regional September 28, 2007 Office Stage II records including a copy of the Site Compliance History Classification Stage II daily inspection logs as of September \_\_ High \_\_ Average X Poor Background Facts: 19, 2007 (violation no. 7). The case was received by the Litigation Division Person Compliance History Classification on March 19, 2008. The EDPRP was filed on Completed Station representative training, and May 15, 2008. The Respondent filed an answer \_\_ High \_\_\_ Average \_X Poor all current employees received in-house Stage and the case was referred to SOAH. The II vapor recovery training as of September 28, Major Source: Yes X No preliminary hearing was held and the parties 2007 (violation no. 8). engaged in discovery. Settlement was achieved and a signed Agreed Order was received on July Applicable Penalty Policy: September 2002 5. Successfully conducted the required annual 21, 2009. testing of the Stage II equipment as of October 11, 2007 (violation no. 9). Current Compliance Status: 6. Upgraded the Stage II equipment to onboard The Respondent has not yet submitted documentation to certify compliance with the refueling vapor recovery ("ORVR") compatible systems on October 11, 2007 (violation no. 10). technical requirements. Ordering Provisions: PST: 1. Failed to provide a method of release The Respondent shall undertake the following detection capable of detecting a release from any technical requirements: portion of the UST system which contained regulated substances, failed to provide release 1. Immediately: detection for the piping associated with the USTs, a. Begin conducting effective manual or and failed to test the line leak detectors at least automatic inventory control procedures for once per year for performance and operational all USTs; and Tex. Admin. Code reliability [30 § 334.50(a)(1)(A), (b)(2), and (b)(2)(A)(i)(III), b. Ensure shear valves are installed and securely and Tex. WATER CODE § 26.3475(a) and (c)(1)]. anchored at the base of each dispenser. 2. Within 30 days: 2. Failed to conduct effective manual or a. Implement a release detection method for all automatic inventory control procedures for all USTs at the Station; USTs involved in the retail sale of petroleum substances used as motor fuel [30 TEX. ADMIN. b. Ensure that corrosion protection is in place for CODE § 334.48(c)]. all underground components of the underground UST system; and 3. Failed to provide an amended UST registration to the Commission for any change of c. Begin maintaining the Stage II vapor recovery additional information regarding USTs within 30 system in proper operating condition, this

days from the date of the occurrence of the change

or addition. Also, failed to timely renew a

previously issued UST delivery certificate by

# RESPONDENT NAME: INTERGLOBE TRADE CHANNEL, INC. AKA F & H STATION, INC. Page 3 of 3

DBA DOSSANI FOOD MART	Pag
DOCKET NO · 2007-1600-PST-E	

VIOLATION SUMMARY CHART:		
VIOLATION INFORMATION	PENALTY CONSIDERATIONS	CORRECTIVE ACTIONS TAKEN/REQUIRED
submitting a properly completed UST registration and self-certification form at least 30 days before the expiration date [30 Tex. ADMIN. CODE §§ 334.7(d)(3) and 334.8(c)(5)(B)(ii)].		Within 45 days, submit written certification demonstrating compliance.
4. Failed to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the USTs [30 Tex. ADMIN. CODE § 334.8(c)(5)(A)(i) and Tex. WATER CODE § 26.3467(a)].		
5. Failed to install an emergency shutoff valve (shear valve or impact valve) on each pressurized delivery or product line and ensure that it is securely anchored at the base of the dispenser [30 Tex. ADMIN. CODE § 334.45(c)(3)(A)].		
6. Failed to provide corrosion protection to all underground components of an UST system which is designed or used to convey, contain, or store regulated substances [30 Tex. Admin. Code § 334.49(b)(2) and Tex. Water Code § 26.3475(d)].		
7. Failed to maintain Stage II records at the Station and make them available for review upon request by agency personnel [30 Tex. ADMIN. CODE § 115.246(6) and Tex. Health & Safety CODE § 382.085(b)].		
8. Failed to ensure that at least one Station representative received training in the operation and maintenance of the Stage II Vapor Recovery System, and each current employee receives inhouse Stage II vapor recovery training regarding the purpose and correct operation of the vapor recovery equipment [30 Tex. ADMIN. CODE § 115.248(1) and Tex. Health & Safety Code § 382.085(b)].		
9. Failed to verify proper operation of the Stage II equipment at least once every 12 months [30 Tex. Admin. Code § 115.245(2) and Tex. Health & Safety Code § 382.085(b)].		
10. Failed to upgrade the Stage II equipment to Onboard Refueling Vapor Recovery ("ORVR") compatible systems, and failed to post operating instructions conspicuously on the front of each gasoline dispensing pump [30 Tex. ADMIN. CODE § 115.242(1)(C) and (9) and Tex. Health & Safety Code § 382.085(b)].		

	Penalty Calculation	n Worksheet (PC	CW)	
Policy Revision 2 (Sep	tember 2002)		PCW Revision Sep	otember 19, 2007
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Assigned PCW	1-Oct-2007 5-Mar-2008 Screening 3-Oct-2007	EPA Due	andi araigay waa saa	
And the second s				
ESPONDENT/FACILITY	INFORMATION			
Respondent	Interglobe Trade Channel, Inc. dba Dossani	ноод Магт		_
Reg. Ent. Ref. No. Facility/Site Region	RN1015/2444	Major/Minor Source	Minor	
Facility/Site Region	4-Dallas/Port World	Major/Millor Source	VIIITOI	MATERIAL MATERIAL MATERIAL MATERIAL PROPERTY.
ASE INFORMATION			· · · · · · · · · · · · · · · · · · ·	
Enf./Case ID No.	34736	No. of Violations	10	
Docket No.	2007-1600-PST-E	Order Type	1660	
Media Program(s)	Petroleum Storage Tank	Enf. Coordinator		
Multi-Media			EnforcementTeam 6	
Admin. Penalty \$ I	Limit Minimum \$0 Maximum	\$10,000		
	Penalty Calcula	tion Section		
	· · · · · · · · · · · · · · · · · · ·		10 to 11 10 10 10 10 10 10 10 10 10 10 10 10	
OTAL BASE PENAL	TY (Sum of violation base penaltie	s)	Subtotal 1	\$19,000
oren en son esta en la cambion en espera in consti				er og av i alvande
ADJUSTMENTS (+/-)				
Subtotals 2-7 are obtai	ned by multiplying the Total Base Penalty (Subtotal 1) by	the indicated percentage.	tals 2 3 & 7	\$7.030
	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%	Enhancement Subto	tals 2, 3, & 7	\$7,030
Subtotals 2-7 are obtai	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37% Enhancement for one prior 1660 Order, on	Enhancement <b>Subto</b> to prior NOV with same or	tals 2, 3, & 7	\$7,030
Subtotals 2-7 are obtal Compliance Histo	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%	Enhancement <b>Subto</b> to prior NOV with same or	tals 2, 3, & 7	\$7,030
Subtotals 2-7 are obtal Compliance Histo Notes	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.	Enhancement <b>Subto</b> : e prior NOV with same or , and poor performer		
Subtotals 2-7 are obtal Compliance Histo	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37% Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.	Enhancement <b>Subto</b> to prior NOV with same or	tals 2, 3, & 7	\$7,030 \$0
Subtotals 2-7 arè obtal Compliance Histo Notes	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.	Enhancement Subtone prior NOV with same or and poor performer  Enhancement		
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Subtotals 2-7 arè obtál Compliance Histo Notes Culpability	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 0%	Enhancement Subtone prior NOV with same or and poor performer  Enhancement		\$0
Subtotals 2-7 are obtai Compliance Histo Notes Culpability Notes	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 0%	Enhancement Subtone prior NOV with same or and poor performer  Enhancement culpability criteria.	Subtotal 4	\$0
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Subtotals 2-7 are obtained Compliance History Notes Culpability Notes Good Faith Effor	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 0%	Enhancement Subtone prior NOV with same or and poor performer  Enhancement culpability criteria.	Subtotal 4	\$0
Subtotals 2-7 are obtain Compliance History Notes Culpability Notes Good Faith Effor Extraordinary Ordinary N/A	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, or similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 0%  Before NOV NOV to EDPRP/Settlement Offer x (mark with x)	Enhancement Subtone prior NOV with same or and poor performer  Enhancement  culpability criteria.  Reduction	Subtotal 4	\$0
Subtotals 2-7 are obtained Compliance History Notes Culpability Notes Good Faith Effort Extraordinary Ordinary	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, or similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 0%  Before NOV NOV to EDPRP/Settlement Offer x (mark with x)	Enhancement Subtone prior NOV with same or and poor performer  Enhancement  culpability criteria.  Reduction	Subtotal 4	\$0
Subtotals 2-7 are obtain Compliance History Notes Culpability Notes Good Faith Effor Extraordinary Ordinary N/A	ned by multiplying the Total Base Penalty (Subtotal 1) by ony 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 8 Before NOV NOV to EDPRP/Settlement Offer X (mark with x)  The Respondent does not meet the	Enhancement Subto e prior NOV with same or , and poor performer  Enhancement culpability criteria.  Reduction  good faith criteria.	Subtotal 4 Subtotal 5	\$0 \$0
Subtotals 2-7 are obtain Compliance History Notes Culpability Notes Good Faith Effor Extraordinary Ordinary N/A	ned by multiplying the Total Base Penalty (Subtotal 1) by ony 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 8 Before NOV NOV to EDPRP/Settlement Offer X (mark with x)  The Respondent does not meet the	Enhancement Subto e prior NOV with same or , and poor performer  Enhancement culpability criteria.  Reduction  good faith criteria.  Enhancement*	Subtotal 4	\$0
Subtotals 2-7 are obtain Compliance History Notes Culpability Notes Good Faith Effor Extraordinary Ordinary N/A Notes	ned by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the service of the Respondent does not me	Enhancement Subto e prior NOV with same or , and poor performer  Enhancement culpability criteria.  Reduction  good faith criteria.	Subtotal 4 Subtotal 5	\$0 \$0
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Subtotals 2-7 are obtained Compliance History Notes Culpability Notes Good Faith Effor Extraordinary Ordinary N/A Notes	red by multiplying the Total Base Penalty (Subtotal 1) by ory 37%  Enhancement for one prior 1660 Order, on similar violations, one dissimiliar NOV classification.  No 0%  The Respondent does not meet the to Comply 8 Before NOV NOV to EDPRP/Settlement Offer X (mark with x)  The Respondent does not meet the comply 8 Total EB Amounts \$1,728 Cost of Compliance \$10,050	Enhancement Subtone prior NOV with same or and poor performer  Enhancement Culpability criteria.  Reduction  good faith criteria.  Enhancement at the Total EB \$ Amount	Subtotal 4 Subtotal 5	\$( \$(

Recommended enhancement to capture the avoided cost associated

with violation nos 1 and 9.

Deferral not offered for non-expedited settlement.

OTHER FACTORS AS JUSTICE MAY REQUIRE

Reduces the Final Assessed Penalty by the indicted percentage. (Enter number only; e.g. 20 for 20% reduction.)

Reduces or enhances the Final Subtotal by the indicated percentage.

Notes

Notes

**PAYABLE PENALTY** 

DEFERRAL

STATUTORY LIMIT ADJUSTMENT

\$1,400

\$27,430

\$27,430

\$27,430

\$0

Adjustment

Adjustment

Final Penalty Amount

Final Assessed Penalty

Reduction

Screening Date 3-Oct-2007

Docket No. 2007-1600-PST-E

PCW

Respondent Interglobe Trade Channel, Inc. dba Dossani Food Mart

Case ID No. 34736

Policy Revision 2 (September 2002) PCW Revision September 19, 2007

Reg. Ent. Reference No. RN101572444

Media [Statute] Petroleum Storage Tank

Enf. Coordinator Judy Kluge

	Number of	nter Number Here	Adjust.
NOVs	Written NOVs with same or similar violations as those in the current enforcement action (number of NOVs meeting criteria)	1	5%
	Other written NOVs	1	2%
	Any agreed final enforcement orders containing a denial of liability (number of orders meeting criteria)	1	20%
Orders	Any adjudicated final enforcement orders, agreed final enforcement orders without a denial of liability, or default orders of this state or the federal government, or any final prohibitory emergency orders issued by the commission	0	0%
Judgments	Any non-adjudicated final court judgments or consent decrees containing a denial of liability of this state or the federal government (number of judgements or consent decrees meeting criteria)	0	0%
and Consent Decrees	Any adjudicated final court judgments and default judgments, or non-adjudicated final court judgments or consent decrees without a denial of liability, of this state or the federal government	0	0%
Convictions	Any criminal convictions of this state or the federal government (number of counts)	0	0%
Emissions	Chronic excessive emissions events (number of events)	0	0%
Audits	Letters notifying the executive director of an intended audit conducted under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which notices were submitted)	0	0%
ridato	Disclosures of violations under the Texas Environmental, Health, and Safety Audit Privilege Act, 74th Legislature, 1995 (number of audits for which violations were disclosed)	0	0%
	Pleas	se Enter Yes or No	
ŀ	Environmental management systems in place for one year or more	No	0%
Other	Voluntary on-site compliance assessments conducted by the executive director under a special assistance program	No	0%
Olliei	Participation in a voluntary pollution reduction program	No	0%
	Early compliance with, or offer of a product that meets future state or federal government environmental requirements	No	0%
	Adjustment P	ercentage (Su	btotal 2)
peat Violator (S	ubtotal 3)		
N	Adjustment Po	ercentage (Su	btotal 3)
mpliance Histor	y Person Classification (Subtotal 7)	lika e da dida	uni in landa eta eta eta eta eta eta eta eta eta et
Poor Pe	rformer Adjustment P	ercentage (Su	btotal 7)
mpliance Histor	y Summary		
Compliance History Notes	Enhancement for one prior 1660 Order, one prior NOV with same or similar violations, one days and poor performer classification.	issimiliar NOV,	

Screening Da	ate 3-Oct-2007	ALL CALLS WATER	Doc	ket No. 2007-1600	D-PST-E		PCW
Responde	ent Interglobe Tra	ade Channel, Ir	nc. dba Dossani	Food Mart		Policy Re	vision 2 (September 2002)
Case ID N	<b>Vo.</b> 34736					PCW Re	vision September 19, 2007
Reg. Ent. Reference	<b>lo.</b> RN10157244	4					
Media [Statu	te] Petroleum St	orage Tank					
Enf. Coordinate	tor Judy Kluge	_					
Violation Num	ber 1				•		. [
Rule Cite	e(s) 30 Tex. Ad	dmin. Code § 3		b)(2), and (b)(2)(A)(i 5(a) and (c)(1)	)(III) and Tex.	Water	-
Violation Descript	tion portion of t	the UST system tection for the p	n which containe olpling associated	tion capable of detect d regulated substand d with the USTs, and performance and op	ces, failing to p failing to test t	rovide he line	
					Base	Penalty[	\$10,000
>> Environmental, Proper	ty and Human	Health Mati	rix				
and the state of	die Collins of Miller State State Selection (Collins of Collins of	Harm	and the second second second section of the	Albanis in del min metro di disensa acramo pubblishe est al trainment	Philips Laure Planter e últ príobh lebrahaille		,
Rele		Moderate	Minor		•		
I Cooke Dried Col	tual			Percent	25%		
Poter	ntial x	<u> </u>		reiteilt	2576		
>>Programmatic Matrix							
Falsificat	ion Major	Moderate	Minor	Company Company Company			
	1			Percent	0%		
	سيريوس البسي	11					
Matrix Notes Human that	health or the envi	ronment will or human health	could be expose or environmenta	ed to pollutants which I receptors as a resu	h would exceed alt of the violati	d levels on.	
				Adjustmen	t	\$7,500	
						Г	\$2,500
-						Ŀ	Ψ2,000
Violation Events							,
Number of	f Violation Events	1		43 Number o	of violation days	3	
	daily monthly					, [	\$2,500
mark only ( with an )		X			/iolation Base	Penaity	φ2,500
· One qual				tation of the violatior 2007 screening date		gust 21,	
Economic Benefit (EB) for	r this violation			Statuto	ry Limit Tes	t	
Estim	ated EB Amount		\$1,143	Violati	ion Final Pena	ity Total	\$3,609
					, , ,		20.055
CONTRACTOR OF THE CONTRACTOR O		Th	nis violation Fir	nal Assessed Penal	ty (adjusted fo	or limits)	\$3,609

	E	conomic I	3enefit W	orks	sheet		
Respondent	Interglobe Trad	e Channel, Inc. dba	Dossani Food M	art			
Case ID No	-	·					
Reg. Ent. Reference No	-						
	Petroleum Stor	ago Tank					Years of
	-	age rank				Percent Interest	Depreciation
Violation No	. 1						. •
						5.0	18
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
tom Description	1 No commes or $\phi$						
Delayed Conta		4				•	
Delayed Costs Equipment	· · · · · · · · · · · · · · · · · · ·	1		0.0	\$0	\$0	\$0
Equipment				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction	<b></b>			0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System		<del></del>		0.0	\$0	n/a	\$0
Training/Sampling	<u> </u>			0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs	~~~~			0.0	\$0	in/a	\$0
	II .			II U.U	) φ∪	THE REPORT OF THE PARTY OF THE	<b>\$</b> U
Other (as needed)	\$1,500 Estimated co	21-Aug-2007	3-Apr-2008	0.6	\$46	n/a	\$46
Other (as needed)  Notes for DELAYED costs	Estimated co	ost to provide a met The date required	hod of release de is the investigation	0.6 tection f	\$46 or the USTs and to nd the final date is	o conduct proper inv	\$46 rentory control of compliance.
Other (as needed)  Notes for DELAYED costs  Avoided Costs	Estimated co	ost to provide a met The date required	hod of release de is the investigation	0.6 tection for date a	\$46 or the USTs and to nd the final date is item (except for	o conduct proper investme expected date cone-time avoided cone-tim	\$46 ventory control of compliance.
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal	Estimated co	ost to provide a met The date required	hod of release de is the investigation	tection for date an entering	\$46 or the USTs and to d the final date is item (except for	o conduct proper invite expected date of cone-time avoided of \$0	\$46 ventory control of compliance.
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel	Estimated co	ost to provide a met The date required	hod of release de is the investigation	tection for date and terring 0.0 0.0 0.0	\$46 or the USTs and to do the final date is  item (except for \$0 \$0	o conduct proper invite expected date of the expect	\$46 rentory control of compliance.  costs) \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs  Disposal Personnel Inspection/Reporting/Sampling	Estimated co	ost to provide a met The date required	hod of release de is the investigation	tection for date and one of the date and one o	\$46 or the USTs and to the final date is item (except for \$0 \$0 \$0	o conduct proper invite expected date of the expect	\$46 rentory control of compliance.  costs) \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	Estimated co	ost to provide a met The date required	hod of release de is the investigation	0.6 tection for date as	\$46 or the USTs and to do the final date is  item (except for \$0 \$0 \$0 \$0	o conduct proper invite expected date of the expect	\$46 ventory control of compliance.  costs) \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated or procedures.	ost to provide a met The date required  UALIZE [1] avoide	thod of release de is the investigation ad costs before e	0.6 tection f n date an entering 0.0 0.0 0.0 0.0 0.0 0.0	\$46 or the USTs and to the final date is  item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	o conduct proper invite expected date of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$46 ventory control of compliance.  costs) \$0 \$0 \$0 \$0 \$0 \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated co	ost to provide a met The date required	hod of release de is the investigation	0.6 tection f n date an intering 0.0 0.0 0.0 0.0 0.0 1.9	\$46 or the USTs and to not the final date is  item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$90	o conduct proper invite expected date of the expect	\$46  ventory control of compliance.  costs)  \$0  \$0  \$0  \$1,096
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	Estimated or procedures.  ANN  1.000	ost to provide a met The date required  IUALIZE [1] avoide	thod of release de is the investigation ad costs before e	0.6 tection findate and one of the date and on	\$46 or the USTs and to the final date is  item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$96 \$96 \$0	n/a  no conduct proper inverse the expected date of	\$46  ventory control of compliance.  sosts)  \$0  \$0  \$0  \$0  \$0  \$1,096  \$0
Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	Estimated or procedures.  ANN  1.000	ost to provide a met The date required  IUALIZE [1] avoide	thod of release de is the investigation ad costs before e	0.6   tection find date and tection find d	\$46  or the USTs and to the final date is  item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 piping tightness to	o conduct proper inverted date of the expected date	\$46  ventory control of compliance.  costs)  \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$0  \$

Screening Date	3-Oct-2007	Docket	No. 2007-1600-PST-E	PCW
Respondent	Interglobe Trade Channe	el, Inc. dba Dossani Food	Mart	Policy Revision 2 (September 2002)
Case ID No.	34736			PCW Revision September 19, 2007
Reg. Ent. Reference No.	RN101572444			
Media [Statute]	Petroleum Storage Tank	(		
Enf. Coordinator	Judy Kluge			
Violation Number	2			
Rule Cite(s)		30 Tex. Admin. Code §	S 334.48(c)	
Violation Description	Failed to conduct effe USTs involved in	ective manual or automatic	inventory control procedures substances used as motor fu	for all lel.  Penalty \$10,000
>> Environmental, Property a	and Human Health N Harm	1atrix		
OR Release Actual Potential		e Minor	Percent 25%	
>>Programmatic Matrix				
Falsification	Major Moderat	e Minor	Percent 0%	
			llutants which would exceed le ors as a result of the violation.	
			Adjustment	\$7,500
				\$2,500
				Ψ2,300
Violation Events				
Number of Vi	olation Events 1	43	Number of violation days	S
	daily :		Water Day	Penalty \$2,500
mark only one with an x	quarterly x semiannual annual single event		Violation Base	Fenalty \$2,500
One quarterl		based on documentation of to the October 3, 2007 sc	of the violation during August reening date.	21, 2007
Economic Benefit (EB) for th	is violation		Statutory Limit Tes	<b>t</b>
An Michigan British Transport by the Section British B	d EB Amount	\$15]	Violation Final Pena	lity Total \$3,609
		This violation Final As	ssessed Penalty (adjusted fo	or limits) \$3,609
They of water and they are		Edition of the section		

Case ID No. 3 Reg. Ent. Reference No. 6 Media F Violation No. 2 Item Description Delayed Costs	RN101572444 Petroleum Stora 2 Item Cost	age Tank Date Required				Percent Interest	Years of
Media F Violation No. 2 Item Description	Petroleum Stora 2 Item Cost					Percent Interest	Years of
Violation No. 2	2 Item Cost					Percent Interest	Years of
Item Description	Item Cost	Date Required					
•		Date Required					Depreciation
•		Date Required				5.0	15
•	No commas or \$		Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
•	No commas or 2						
Delayed Costs				• •			
Delayeu Gosis_				_			
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	ha in/a	\$0
Record Keeping System	\$500	21-Aug-2007	3-Apr-2008	0.6	\$15	n/a	\$15
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)		LL		0.0	\$0	n/a	\$0
Notes for DELAYED costs	as motor tu	ei. I ne date requir		me inves complian		nal date is the estima	aled date of
Avoided Costs	ΔΝΝΙ	IAL IZE [1] avoide	d costs hefore e			one-time avoided c	nsts)
Avoided Costs	ANN	UALIZE [1] avoide	d costs before e	ntering	item (except for	one-time avoided c	
Disposal	ANN	UALIZE [1] avoide	d costs before e	ntering 0.0	item (except for	\$0	\$0
Disposal Personnel	ANN	UALIZE [1] avoide	d costs before e	0.0 0.0	item (except for \$0 \$0	\$0 \$0	\$0 \$0
Disposal Personnel Inspection/Reporting/Sampling	ANN	UALIZE [1] avoide	d costs before e	0.0 0.0 0.0	item (except for \$0 \$0 \$0	\$0 \$0 \$0	\$0 \$0 \$0
Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	ANN	UALIZE [1] avoide	d costs before e	0.0 0.0	\$0   \$0   \$0   \$0   \$0   \$0	\$0 \$0	\$0 \$0
Disposal Personnel Inspection/Reporting/Sampling	ANN	UALIZE [1] avoide	d costs before 6	0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0	\$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0

	Scre	ening Date	3-Oct-2007	and the second s		Docket No	o. 2007-160	0-PST-E		PCW
	F	espondent	Interglobe Tra	ade Channel, I	nc. dba Dossa	ani Food Ma	rt		Policy Re	evision 2 (September 2002)
		Case ID No.							PCW Re	vision September 19, 2007
Reg.	Ent. Ref	erence No.	RN10157244	4						
		ia [Statute]		orage Tank	e e					
		coordinator	,	7						
	Viol	ation Number	3				——————————————————————————————————————			
		Rule Cite(s)		30 Tex. Adn	nin. Code §§ 3	334.7(d)(3) a	and 334.8(c)	(5)(B)(ii)		
	Violatio	n Description	additional into the chan updated to previously	rovide an amer formation regal ge or addition. reflect the curry sissued UST don and self-cer Specifically, the	ding USTs wi Specifically, ent owner of t elivery certific tification form	thin 30 days the Station's he UST sys ate by subn at least 30	s from the da s UST regist tem. Also, fa nitting a prop days before	ate of the occur ration had not lailed to timely referred to perly completed the expiration	rence of been enew a I UST	
		,						Base	Penalty	\$10,000
>> Enviro	nmental	, Property a	nd Human	Health Mat	ŗ <b>ix</b>					
		Release	Major	Moderate	Minor	-				
OR		Actual Potential					Percent	0%		
							273			***************************************
>>Program	nmatic	i filiphyddolaet a galgaraig (galgalgalgalgalaeth a an an ar ar ar ar ar a'r ar a'r ar a'r ar a'r ar ar a'r ar	Moior	Modorato	Minor					
		Falsification	Major x	Moderate	WIITO		Percent	10%		vicinities and the second seco
	Matrix Notes			100% of the	rule requiren	nent was no	t met.			·
		Total		Landamar di sadada kandamada da sada			Adjustmen	t	\$9,000	
									Ĭ	\$1,000
Violation I	Events		Žene							
		Number of Vic	lation Events	1		3	Number	of violation day	· ·	
		mark only one with an x	daily monthly quarterly semiannual annual single event					/iolation Base	Penalty	\$1,000
		One single ev	ent is recomr	nended based	on document investigati		violation dur	ing the August	21, 2007	
Economic	Benefi	t (EB) for th	is violation	nga 12			Statuto	ry Limit Tes	<b>t</b> ografij	
		Estimated	i EB Amount		\$10	]	Violat	ion Final Pena	ity Total	\$1,444
				7	his violation	Final Assa	ssed Penal	ty (adjusted fo	r (imits)	\$1,444
								\		

	E/	conomic I	Benefit W	orks	sheet		
Respondent	Interglobe Trade	e Channel, Inc. dba	a Dossani Food M	art			•
Case ID No.		,					
Reg. Ent. Reference No.							
		ana Tank					Years of
	Petroleum Stora	ige rank				Percent Interest	Depreciation
Violation No.	, 3					1	•
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No sommon or 6						
item bescription	No commas or \$						
Delayed Costs				1 00		\$0	\$0
Equipment				0.0	\$0	\$0 \$0	\$0 \$0
Buildings				0.0	\$0		\$0 \$0
Other (as needed)				0.0	\$0	\$0 \$0	\$0 \$0
Engineering/construction				0.0	\$0		\$0 \$0
Land				0.0	\$0	775E-150-7797 (1763)	\$10
Record Keeping System	\$500	31-Mar-2007	24-Aug-2007	0.4	\$10	n/a	\$10
Training/Sampling				0.0	\$0	n/a	
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a n/a	\$0 \$0
Other (as needed)				0.0	\$0	SERVING IVA SERVING	φυ
						he date required is	
Notes for DELAYED costs		•				e date of compliance	
Avoided Costs		•		ntering	item (except for	one-time avoided c	osts)
Avoided Costs		•		ntering 0.0	item (except for	one-time avoided c	osts) \$0
Avoided Costs Disposal Personnel		•		ntering 0.0 0.0	item (except for \$0 \$0	one-time avoided c	osts) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling		•		0.0 0.0 0.0	item (except for \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment		•		0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		•		0.0 0.0 0.0 0.0 0.0	s0   \$0   \$0   \$0   \$0   \$0   \$0   \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		•		ntering 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]		•		0.0 0.0 0.0 0.0 0.0	s0   \$0   \$0   \$0   \$0   \$0   \$0   \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]		•		ntering 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Scr	eening Date	3-Oct-2007	1967-1998-1974-1970-1984-1984-1984-1984-1984-1984-1984-1984	Doo	cket No. 2	2007-1600-P	ST-E		PCW
ŀ	Respondent	Interglobe Trade	e Channel, Inc	. dba Dossani I	Food Mart			Policy Rev	ision 2 (September 2002)
	Case ID No.	34736						PCW Revi	ision September 19, 2007
Reg. Ent. Re	ference No.	RN101572444			•				
Med	dia [Statute]	Petroleum Stora	age Tank						
Enf.	Coordinator	Judy Kluge	_						
Vio	lation Number	4							
	Rule Cite(s)	30 Tex. A	\dmin. Code §	334.8(c)(5)(A)	(i) and Tex.	Water Code	§ 26.3467(a)		
Violatio	on Description	before acceptin the Station'	g delivery of a s fuel delivery	a common carrion regulated substantifests indiculated substance	stance into to cated that the	the USTs. Spile Station had	pecifically, rev d received eig	/iew of∥	
	· '						Base P	enalty [	\$10,000
>> Environmenta	ıl, Property a	nd Human H	ealth Matri:	X					
The American Security	reason in the second		Harm		and the same and t	· ·	O Commence or the State of Commence of		
<b>©R</b>	Release Actual Potential	Major	Moderate	Minor	ı	Percent	5%		
>>Programmatic				Minor					
The state of the	Falsification	Major	Moderate	Minor		Percent	0%		
			L			Crociic	0 70		
Matrix Notes	Human healt would not ex	h or the environr ceed levels that	nent will or co are protective	uld be exposed of human heal the violation.	to insignific Ith or enviro	cant amounts nmental rece	of pollutants ptors as a re	which sult of	
					Α,	ljustment		\$9,500	
The state of the s	Control of the Contro		THEY ALL ALLESS		BY FIA		·	ψ <u>υ,ουσ</u>	
								L	\$500
Violation Events		Agent (g) of 100 (g)							
	Number of Vic	olation Events	8		66	Number of vi	olation days		
		daily monthly			•	\#-1	-4i D D	· 	\$4,000
	mark only one with an x	quarterly semiannual annual single event	X			VIOI	ation Base F	enalty_	
		Eight sir	ngle events (o	ne event per dr	op) are reco	ommended.			
Economic Benef	it (EB) for th	is violation		The second state of the se		Statutory l	Limit Test		
	Estimate	d EB Amount		\$0		Violation	Final Penalt	y Total [	\$5,775
			·		A	ad Danalfii /	adinated fe-	limita\ 「	\$5,775
ALLE AND THE STATE OF THE STATE				is violation Fi	IIAI ASSESS	eu renaity (	aujusteu ior	mmes	Ψυ,77υ

	드	conomic i	Benefit W	orks	sheet		
Respondent	Interglobe Trad	e Channel, Inc. dba	a Dossani Food M	art			
Case ID No.	34736						
Reg. Ent. Reference No.	RN101572444						
	Petroleum Stora	age Tank					Years of
Violation No.		ago rann				Percent Interest	Depreciation
Violation No.	. 4						
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs							·
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a 🏒 💢	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)		<u></u> l		0.0	\$0	n/a	\$0
Notes for DELAYED costs				include	d in Violation No.	3.	
Notes for DELAYED costs  Avoided Costs	ANN	UALIZE [1] avoide		include	d in Violation No.	3. one-time avoided c	costs)
Notes for DELAYED costs  Avoided Costs  Disposal	ANN	UALIZE [1] avoids		include	d in Violation No.	3. one-time avoided c	costs)
Notes for DELAYED costs  Avoided Costs  Disposal  Personnel	ANN	UALIZE [1] avoide		ntering 0.0 0.0	d in Violation No.	one-time avoided c	sosts) \$0 \$0
Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling	ANN	UALIZE [1] avoid		ntering 0.0 0.0 0.0	d in Violation No.	one-time avoided c	sosts) \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment	ANN	UALIZE [1] avoide		ntering 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0	3.  one-time avoided c  \$0  \$0  \$0  \$0  \$0	\$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANN	UALIZE [1] avoide		ntering   0.0   0.0   0.0   0.0   0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	3.  one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANN	UALIZE [1] avoide		ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	3.  one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]	ANN	UALIZE [1] avoide		ntering   0.0   0.0   0.0   0.0   0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	3.  one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	ANN	UALIZE [1] avoide		ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	3.  one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]	ANN	UALIZE [1] avoide		ntering 0.0 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	3.  one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Date	3-Oct-2007	Docket No. 2007-1600-PST-E	PCW
Respondent	Interglobe Trad	e Channel, Inc. dba Dossani Food Mart	Policy Revision 2 (September 2002)
Case ID No.	34736		PCW Revision September 19, 2007
Reg. Ent. Reference No.	RN101572444		
Media [Statute]	Petroleum Stor	age Tank	
Enf. Coordinator	Judy Kluge		
Violation Number	5		
Rule Cite(s)		30 Tex. Admin. Code § 334.45(c)(3)(A)	
Violation Description	pressurized de	istall an emergency shutoff valve (aka shear or impact valve) elivery or product line and ensure that it is securely anchornser. Specifically, the shear valves underneath all dispens anchored.	ed at the base ers were not
	urangangasaya sa gagaragangan ayan as		Base Penalty \$10,000
>> Environmental, Property a	ind Human F	lealth Matrix  Harm	· ·
OR Release Actual Potential		Moderate Minor	10%
>>Programmatic Matrix			· ·
Falsification	Major	Moderate Minor	
		Percent	0%
Matrix Notes Human heal would not ex	th or the enviror ceed levels that	nment will or could be exposed to a significant amount of pot t are protective of human health or environmental receptors the violation.	ollutants which s as a result of
		Adjustment	\$9,000
			\$1,000
Violation Events			
Number of Vir	olation Events	1 43 Number of violation	on days
mark only one with an x	daily monthly quarterly semiannual annual single event		n Base Penalty \$1,000
One quarte	2007 i	ommended based documentation of the violation during the nvestigation to the October 3, 2007 screening date.  Statutory Lim	
f ni (1905) haint sa hii diadaini ammanishiidhen 1900 a bhaille 1900 a baan an 1900 ann h-Ioma 1910 ann an Aidh	d EB Amount ि	r de la companya del la companya de la companya del la companya de	I Penalty Total \$1,444
·			
different of the common transference and committee control of the common transferences. As a common transference of the common tr		This violation Final Assessed Penalty (adju	sted for limits) \$1,444

	. · · E	conomic E	Benefit W	orks	sheet	1000 1000 1000 1000 1000 1000 1000 100	and an amount of the highly a Proposite of Constitution of the Proposition of the Proposi
	ų.	e Channel, Inc. dba	Dossani Food M	art			
Case ID No.							
Reg. Ent. Reference No. Media	RN101572444 Petroleum Stor	age Tank				Percent Interest	Years of
Violation No.	5						Depreciation
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		Dato Hoquilou					
Delayed Costs				_			
Equipment	\$100	21-Aug-2007	3-Apr-2008	0.6	\$0	\$4	\$4
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
.Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	es un/a	\$0
Permit Costs				0.0	\$0	// ///////////////////////////////////	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs	requ	ired is the date of the	ne investigation a	nd the fi	nal date is the exp	of the dispensing usected date of compliance one-time avoided of	ance.
Avoided Costs	ANN	UALIZE [1] avoide	a costs before			\$0	\$0
Disposal				0.0	\$0 \$0	\$0 \$0	\$0
Personnel				0.0		\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment		ļ		0.0	\$0	\$0	\$0
Financial Assurance [2]		<u> </u>			\$0	\$0	\$0
ONE-TIME avoided costs [3]			·····	0.0	\$0	\$0	\$0
Other (as needed)		<u>                                     </u>		0.0	1 30	1 40 1	\$0
Notes for AVOIDED costs						•	
•							
•							

Screening D	ate 3-Oct-2007	Docket No. 2007-1600-PST-E	PCW
		e Channel, Inc. dba Dossani Food Mart	Policy Revision 2 (September 2002)
-	No. 34736		PCW Revision September 19, 2007
Reg. Ent. Reference	<b>No.</b> RN101572444		
	ute] Petroleum Stor	age Tank	
Enf. Coordina	-	·••	
Violation Num			
Rule Ci	\/-\\		
	' / 30 Tex	. Admin. Code § 334.49(b)(2) and Tex. Water Code § 26.3475(d)	
Violation Descrip	which is	de corrosion protection to all underground components of an UST designed or used to convey, contain, or store regulated substance there was no corrosion protection installed on the submersible purwhich were completely full of groundwater.	s.
		Base I	Penalty \$10,000
>> Environmental, Prope	rty and Human H	ealth Matrix	,
And the second distance and the second distance and the second distance and the second distance and the second	Addening the special control of the state of	Harm	
In the Land Maria Property of the a	ease Major	Moderate Minor	
[ 200 BR 88 H 24	ctual	B [ 050/]	
Pote	entiai x	Percent 25%	
	24. 32.43 (20.00 (20.		
>>Programmatic Matrix	tion Major	Moderate	
Falsifica	ition Major	Moderate Minor Percent 0%	
		Percent 070	
		ment will or could be exposed to pollutants which would exceed lever near health or environmental receptors as a result of the violation.	
		Adjustment	\$7,500
			\$2,500
·			42,000
Violation Events			
Number	of Violation Events	1 43 Number of violation days	
mark only with an		X Violation Base	Penalty \$2,500
	2007 i	nmended based on documentation of the violation during the Aug nvestigation to the October 3, 2007 screening date.  Statutory Limit Test	
Economic Benefit (EB) fo	nonation violation	Scalutory Emiliar 1951	And the American Committee of the Commit
Estir	nated EB Amount	\$74 Violation Final Penal	ty Total \$3,609
	_		0.000
		This violation Final Assessed Penalty (adjusted for	r limits) \$3,609

Mark Record (1947) (1947) (1947) (1947) (1947) (1947) (1947) (1947) (1947) (1947) (1947) (1947) (1947) (1947)	Е	conomic E	Benefit W	orks	heet		
Respondent Case ID No.	•	e Channel, inc. dba	Dossani Food M	lart .			
Reg. Ent. Reference No. Media Violation No.	Petroleum Stora	age Tank				Percent Interest	Years of Depreciation
violation No.	0					5.0	15
•	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description		Date Hoquilou	, mai zato				
Delayed Costs							
Equipment	\$1,500	21-Aug-2007	3-May-2008	0.7	\$4	\$70	\$74
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a 🗰 💷	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a	\$0
Other (as needed)				0.0	\$0	≟⇔ n/a	\$0
Notes for DELAYED costs  Avoided Costs	requ	ired is the date of the	ne investigation a	nd the fi	nal date is the exp	nents of the UST sy ected date of compli one-time avoided of	iance.
Disposal	7.11			0.0	\$0	\$0	\$0
Personnel				0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling				0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]		<del> </del>		0.0	\$0	\$0	\$0
ONE-TIME avoided costs [3]		<del> </del>		0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Notes for AVOIDED costs							
Approx. Cost of Compliance		\$1,500			TOTAL		\$74

Screei	ning Date 3-0	ct-2007		Docket No.	2007-1600-PST-E		PCW
			nnel, Inc. dba Dos	sani Food Marl		Policy Revision	on 2 (September 2002)
Ca	se ID No. 347	36				PCW Revisio	n September 19, 2007
Reg. Ent. Refer	<b>rence No.</b> RN1	01572444					
Media	[Statute] Petr	oleum Storage T	ank				
	ordinator_Judy	y Kluge					
	ion Number	7	***************************************				
F	Rule Cite(s)	30 Tex. Admin.	Code § 115.246(6)	and Tex. Healt	h & Safety Code § 382.085	(b)	
Violation I	Fa Description u	pon request by a	Stage II records at gency personnel. age II Vapor Recov	Specifically, the	I make them available for re daily inspection records for re not available.	eview r the	
					Base P	enalty	\$10,000
>> Environmental,		Human Healt Ha Major Mode	rm				
OR	Actual	inajor inous	7,010	<b>1</b>			
	Potential				Percent 0%		
>>Programmatic M	atrix		State (1881)				
percent of his percent of the contract of the	A CARDINE CARRAGON CONTRACTOR OF A CASE OF CONTRACTOR OF THE	Major Mode	erate Minor				
		x			Percent 10%		<b>а</b>
Matrix Notes		1009	% of the rule require			\$0.000	
		and a second of the second of			Adjustment	\$9,000	<b>0</b> 4 000
							\$1,000
Violation Events							
a individual de comunicación de la lacción de lacción d	The control of the co	Sand a hala say a manada da a		and the said of th	The state of the s	nacht, 11 ceillead	
				29	Number of violation days		
		daily					
	# industrial # ind	nonthly			•		1
	11211100, 101	uarterly			Violation Base F	Penalty	\$1,000
·	with an x ser	miannual 🔃					
	2.55990	annual			•		
	sin	gle event					
						4.0007	
	One single event	is recommended	based on docume investiga		iolation during the August 2	1,2007	
Economic Benefit (	(EB) for this v	iolation			Statutory Limit Test		
	Estimated EB	Amount		52	Violation Final Penalt	y Total	\$1,444
			This	on Einel Acces	ssed Penalty (adjusted for	limite\	\$1,444
			inis violati	on Filial ASSes	oseu renaity (aujusteu loi		Ψ1,-1-1

D		COHOITHE	Benefit W	OIKS	meet		
Respondent	Interglobe Trad	e Channel, Inc. dba	a Dossani Food M	art			
Case ID No.	34736						
Reg. Ent. Reference No.	RN101572444						
	Petroleum Stor	ane Tank					Years of
Violation No.		ago raint				Percent Interest	Depreciation
violation No.	1					1	
			+			5.0	. 15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commes or \$						
item besonption	THE CONTINUES OF S						
Dalassad Canta							
Delayed Costs		7		0.0	\$0	\$0	\$0
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)	<u></u>			0.0	\$0	\$0	\$0
Engineering/construction	ļ	<del> </del>		0.0	\$0	n/a	\$0
Land	\$500	21-Aug-2007	19-Sep-2007	0.1	\$2	n/a	\$2
Record Keeping System	\$500	21-Aug-2007	19-36p-2001	0.0	\$0	n/a	\$0
Training/Sampling		<del></del>		0.0	\$0	n/a	\$0
Remediation/Disposal		<u> </u>		0.0	\$0	n/a	\$0
Permit Costs Other (as needed)		<u> </u>		0.0	\$0	n/a	\$0
,	31						
Notes for DELAYED costs	Estimated cos	t to maintain record	is at the Station. the c	The date omplian	e required is the in ce date.	vestigation date and	the final date is
			the c	omplian	ce date.		
Avoided Costs			the c	omplian	ce date.	vestigation date and one-time avoided c	
Avoided Costs Disposal			the c	ompliand	ce date.	one-time avoided c	sosts) \$0 \$0
Avoided Costs Disposal Personnel			the c	ompliand	item (except for	one-time avoided c \$0 \$0 \$0	\$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling			the c	entering	item (except for \$0 \$0	one-time avoided o	\$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment			the c	ompliand ontering 0.0 0.0 0.0	item (except for \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			the c	entering 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment			the c	entering 0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided c	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)			the c	entering   0.0   0.0   0.0   0.0   0.0   0.0   0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			the c	entering   0.0   0.0   0.0   0.0   0.0   0.0   0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	one-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0

Screen	ning Date	3-Oct-2007			Docket N	lo. 2007-1600-PST-E		PCW
i e	_	Interglobe Trac	le Channel, Ir	nc. dba Dos	sani Food M	art	Policy Re	vision 2 (September 2002)
Ca	se ID No.	34736					PCW Re	vision September 19, 2007
Reg. Ent. Refer	rence No.	RN101572444						
Media	[Statute]	Petroleum Stor	age Tank					
£	ordinator							
Violati	on Number	8						
F	Rule Cite(s)	30 Tex. Ad	lmin. Code §	115.248(1)	and Tex. He	ealth & Safety Code § 38	32.085(b)	
Violation [	Description	operation and employee rece correct operat	d maintenance eives in-house ion of the vap	e of the Stage e Stage II va or recovery	ge II Vapor F apor recover equipment.	sentative received traini Recovery System, and a y training regarding the Specifically, Stage II tr s had not been complet	each current purpose and aining for the	·
•						1	Base Penalty[	\$10,000
>> Environmental, I	Property a	ind Human I	lealth Matr Harm	ix .			Name Andrea	
	Release	Major	Moderate	Minor	<del>=</del> 1			
OR	Actual				4	Davaget 10	0/	•
	Potential		X	·····		Percent 10	<del>7</del> 6]	
>>Programmatic Ma	atrix							
The first of the second of the contract of the	alsification	Major	Moderate	Minor		Kara		
					]	Percent 0	%	
					health or er	nificant amounts of pollo nvironmental receptors		
	arang Perang					Adjustment	\$9,000	
						Adjustment	\$9,000	
								\$1,000
Violation Events							2. 2.20 E	
		Г	1		38	Number of violation	davs	
		<u> L</u>					,-	
		daily						
	,	monthly [						04.000
,	mark only one	quarterly	Х			Violation I	Base Penaity	\$1,000
	with an x	semiannual   annual						
		single event						
	One quarter					f the violation during the compliance date.	e August 21,	
Economic Benefit (	EB) for th	is violation				Statutory Limit	Test	
	Estimated	d EB Amount		\$	3	Violation Final I	Penalty Total	\$1,444
					_			<b>A</b>
and the second of the second o			<b>T</b>	his violatio	n Final Ass	essed Penalty (adjust	ed for limits)	\$1,444

		conomic i	Benefit <b>W</b>	orks	heet		
Respondent	Interglobe Trade	e Channel, Inc. dba	a Dossani Food Ma	art			
Case ID No.	34736						
Reg. Ent. Reference No.	RN101572444						
	Petroleum Stora	age Tank					Years of
Violation No.		ago rain				Percent Interest	Depreciation
Violation No.	. <b>o</b>						•
						5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description	No commas or \$						
Delayed Costs	•						
Equipment				0.0	\$0	\$0	\$0
Buildings				0.0	\$0	\$0	\$0
Other (as needed)				0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land				0.0	\$0	///n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling	\$500	21-Aug-2007	28-Sep-2007	0.1	\$3	n/a	\$3
Remediation/Disposal				0.0	\$0	n/a	\$0
Permit Costs				0.0	\$0	n/a.	\$0
Other (as needed)				0.0	\$0	n/a	\$0
	<del> </del>		Cintinu vannaant	ativa T	ha data raquirad i	a the investigation d	ate and the final
Notes for DELAYED costs			date is the	date of	compliance.	s the investigation do	
Avoided Costs			date is the	date of	compliance.	one-time avoided c	
Avoided Costs			date is the	date of	item (except for		osts)
Avoided Costs Disposal Personnel			date is the	date of	compliance.	one-time avoided o	osts)
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling			date is the	0.0 0.0	item (except for \$0 \$0	one-time avoided c	sosts) \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment			date is the	0.0 0.0 0.0	item (except for \$0 \$0 \$0	one-time avoided c \$0 \$0. \$0.	\$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling			date is the	0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0	0ne-time avoided c \$0 \$0. \$0 \$0	\$0 . \$0 . \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2]			date is the	0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0	0ne-time avoided of \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0 \$0 \$0 \$0 \$0 \$0
Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3]			date is the	0.0 0.0 0.0 0.0 0.0 0.0	item (except for \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0   \$0   \$0   \$0   \$0   \$0   \$0   \$0	\$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0

Screening Da	te 3-Oct-2007	Docket I	No. 2007-1600-PST-E	PCW
Responde	<b>nt</b> Interglobe Trade (	Channel, Inc. dba Dossani Food N	Mart Poli	icy Revision 2 (September 2002)
Case ID N	<b>o.</b> 34736		PC	W Revision September 19, 2007
Reg. Ent. Reference N	<b>o.</b> RN101572444	•		
Media [Statut	e] Petroleum Storage	e Tank		·
Enf. Coordinate	or Judy Kluge			
Violation Numb	er 9		· · · · · · · · · · · · · · · · · · ·	
Rule Cite	(s) 30 Tex. Admi	n. Code § 115.245(2) and Tex. H	ealth & Safety Code § 382.085(b)	
· Violation Descripti			equipment at least once every 12 n compliance testing had not been	
			Base Pena	alty \$10,000
>> Environmental, Propert	y and Human Hea	ılth Matrix		
The state of the s	· ·	Harm		
OR Relea		oderate Minor		
OR Actu			Percent 25%	
<u> </u>				
>>Programmatic Matrix	Mojor M	oderate Minor		
Falsification	on Major Mo	oderate Minor	Percent 0%	
. L			070	200
		nt will or could be exposed to poll n health or environmental recepto	lutants which would exceed levels ors as a result of the violation.	that
			Adjustment \$7,	500
itt på skil kulturers (syddian) millide endrikkererer millidikkerbuldikere million er ekt et fram et sim etteme T	risk ook ookkin 1949, Frans i Zhararrikaalii ilik da ny maa binaba Paranadi	***************************************		, 00.500
				\$2,500
Violation Events		A Committee of the Comm		
<b>N</b>	\"-1-" <del>-</del>	4 7 205	Number of violeties days	***************************************
Number of	Violation Events	1 365	Number of violation days	
mark only o with an x	daily monthly quarterly semiannual annual single event	X	Violation Base Pen	alty \$2,500
One	annual event is recor	nmended for the 12 month period investigation.	d preceding the August 21, 2007	
Economic Benefit (EB) for	this violation		Statutory Limit Test	
Estima	ted EB Amount	\$438	Violation Final Penalty To	otal \$3,609
		This violation Final As	sessed Penalty (adjusted for lim	nits) \$3,609

	E	conomi <b>c</b> l	Benefit W	orks	heet	÷	
Respondent	: Interglobe Trad	e Channel, Inc. dba	Dossani Food M	art			
Case ID No.	. 34736						
Reg. Ent. Reference No.	RN101572444				•		
Media	Petroleum Stor	age Tank				Percent Interest	Years of
Violation No.						reicent interest	Depreciation
Violation No.	. •					5.0	15
	Item Cost	Date Required	Final Date	Yrs	Interest Saved	Onetime Costs	EB Amount
Item Description							
Dalawad Coots							
Delayed Costs Equipment	,	ir		0.0	\$0	· \$0	\$0
· Buildings				0.0	\$0	\$0	\$0
Other (as needed)		<del> </del>		0.0	\$0	\$0	\$0
Engineering/construction				0.0	\$0	\$0	\$0
Land			·····	0.0	\$0	n/a	\$0
Record Keeping System				0.0	\$0	n/a	\$0
Training/Sampling				0.0	\$0	n/a	\$0
Remediation/Disposal				0.0	y \$0	n/a	\$0
. Permit Costs				0.0	\$0	n/a a	\$0
Other (as needed)				0.0	\$0	n/a	\$0
Notes for DELAYED costs  Avoided Costs	ANI	IIIAI IZE [1] avoide	nd costs before	enterina	item (except for	one-time avoided o	osts)
	ANI	ICALIZE [1] avoide	d Costs Defore 6	0,0	\$0	\$0	\$0
Disposal Personnel	-	1		0.0	\$0	\$0	\$0
Inspection/Reporting/Sampling		<del> </del>		0.0	\$0	\$0	\$0
Supplies/equipment				0.0	\$0	\$0	\$0
Financial Assurance [2]	ļ			0.0	\$0	\$0	\$0
	\$400	21-Aug-2006	21-Aug-2007	1.9	\$38	\$400	\$438
ONE-TIME avoided costs [3]					60	0.0	\$0
ONE-TIME avoided costs [3]	7,77,2						
Other (as needed)		r annual testing to v	erify proper opera	0.0 ation of t	\$0 he Stage II equipm	\$0 nent. The date requ	
• •				ation of t		nent. The date requ	

Screening Da	te 3-Oct-2007	Docket N	o. 2007-1600-PST-E	PCW
_		Channel, Inc. dba Dossani Food Ma	art	Policy Revision 2 (September 2002)
Case ID N	o. 34736			PCW Revision September 19, 2007
Reg. Ent. Reference N	o. RN101572444	·		
Media [Statut	te] Petroleum Storag	je Tank		
Enf. Coordinat	or Judy Kluge			
Violation Numb			***************************************	
Rule Cite	(s) 30 Tex. Adm	in. Code § 115.242(1)(C) and (9) a 382.085(b)	nd Tex. Health & Safety Code	; §
Violation Descripti		e the Stage II equipment to Onboard tems. Also, failed to post operating front of each gasoline dispe	instructions conspicuously of	
			Base F	Penalty \$10,000
>> Environmental, Propert	v and Human He	alth Matrix		
	Andrew Control of the	Harm	Marie Marie and the marie and	
Relea		oderate Minor		
OR Act				. ,
Poten	tial	X	Percent 10%	
			AND THE RESERVE OF THE PARTY OF	
>>Programmatic Matrix Falsificati	on Major M	loderate Minor		
1 alsilicati	on wajor iv	ioderate Willor	Percent 0%	•
Human h	ealth or the environn	nent will or could be exposed to sign	nificant amounts of pollutants	which
Matrix   would not		re protective of human health or en		
Notes		the violation.		
			400 1 Market 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
			Adjustment	\$9,000
				\$1,000
				Ψ1,000
Violation Events				
general service and the service of t		De Commission de la Com	in in the court of 2.5 cm, an account and interest in many belong to a minute security	unia-aminina dia-aminina
Number of	Violation Events	1 43	Number of violation days	
	<b>■</b> 921 - 1001 (201 = 100 × 100 pm)			
	daily			
	monthly		Violation Base F	Penalty \$1,000
mark only o with an x		<u> </u>	Violation dase r	remarky \$1,000
······ =	annual			
	single event	<del></del>		
			•	
		nended based on documentation of	f the violation during the Augus	net 21
Une qua		estigation to the October 3, 2007 s		
	2007 1114			
Economic Benefit (EB) for	this violation		Statutory Limit Test	
Fetime	ated EB Amount	\$39	Violation Final Penalt	v Total \$1,444
Estino	ACC ED AMOUNT			
		This violation Final Ass	essed Penalty (adjusted for	limits) \$1,444

5.0				art	Dossani Food Ma	Channel, Inc. dba	Interglobe Trade	Respondent
Reg. Ent. Reference No. RN101572444   Media   Petroleum Storage Tank   Violation No. 10							•	•
Nedia   Petroleum Storage Tank   Violation No. 10								
Item Cost   Date Required   Final Date   Yrs   Interest Saved   Onetime Costs	Years of		Γ			T1-		
Item Cost   Date Required   Final Date   Yrs   Interest Saved   Onetime Costs	Depreciation	Percent Interest				ge I ank		
Delayed Costs	15	5.0						
Delayed Costs	EB Amount	Onetime Costs	Interest Saved	Yrs	Final Date	Date Required	Item Cost	
Sale						·	No commas or \$	Item Description
Say		,						D. I. (0)
Buildings   Simple	\$34	\$32	\$2	0.1	11-Oct-2007	21-440-2007	\$3.450	
Post Operating Instructions Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)  \$100	\$0				11-001-2007	21-A09-2001	\$5,450	· - I
Engineering/construction Land Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Actual cost to upgrade the Stage II equipment to ORVR compatible systems. The date require investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)    O.0 \$0	\$5				3 May 2008	21 Aug 2007	\$100	_
Land   Record Keeping System   Training/Sampling   Remediation/Disposal   Permit Costs   O.0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0				3-Way-2000	21-Aug-2001	\$100	
Record Keeping System Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Actual cost to upgrade the Stage II equipment to ORVR compatible systems. The date require investigation date and the final date is the compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date.  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)  O.0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0 \$0	\$0							I
Training/Sampling Remediation/Disposal Permit Costs Other (as needed)  Actual cost to upgrade the Stage II equipment to ORVR compatible systems. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is	\$0							
Remediation/Disposal Permit Costs Other (as needed)  Notes for DELAYED costs  Avoided Costs Disposal Personnel Inspection/Reporting/Sampling Supplies/equipment Financial Assurance [2] ONE-TIME avoided costs [3] Other (as needed)	\$0							1
Permit Costs Other (as needed)  Notes for DELAYED costs  Actual cost to upgrade the Stage II equipment to ORVR compatible systems. The date required investigation date and the final date is the compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction date and the final date is the expected compliance date. Estimated cost to post operating instruction date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the investigation date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers. The date required is the compliance date. Estimated cost to post operating instruction dispensers. The date required is the compliance date. Estimated cost to post operating instruction dispensers. The date required is the compliance date. Estimated cost to post operating instruction dispensers. The date required is the compliance date. Estimated cost to post operating instruction date and the final date is the expected compliance date. Estimated cost to post operating instruction dispensers.	\$0							
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Inspection/Reporting/Sampling	\$0							Disposal
Supplies/equipment	\$0							Personnel
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	\$0			<del></del>				15
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								Notes for AVOIDED costs
	<del></del>					<u> </u>		

### **Compliance History**

Customer/Respondent/Owner-Operator:		CN603243882	Interglobe Trade Channel, In	c. Classification	POOR	Rating: 53.40
Regulat	ted Entity:	RN101572444	DOSSANI FOOD MART	Classification:	POOR	Site Rating: 53.40
ID Num	ber(s):	PETROLEUM ST REGISTRATION		REGISTRATION		53419
Location	n:		OR, LAKE DALLAS, TX, 75065	Rating Date: 9/1/2007	Repeat Viola	ator? No
TCEQ F	Region:	REGION 04 - DF	W METROPLEX			
Date Co	ompliance History Prepared:	October 03, 2007	· '			
Agency Decision Requiring Compliance History:		Enforcement				
Compliance Period:		October 03, 2002	to October 03, 2007			
TCEQ S Name:	Staff Member to Contact for Additional Info		chis Compliance History one: 817-588-5825			
		Site C	ompliance History Compo	nents		·
1. Has 1	the site been in existence and/or operation	for the full five year	compliance period?	Yes		
	there been a (known) change in ownership s, who is the current owner?	of the site during th	ne compliance period?	Yes		
				Interglobe Trade Channe	l, Inc.	
4. if Ye	es, who was/were the prior owner(s)?			Texmich, Inc.		
5. Whe	en did the change(s) in ownership occur?			04/11/2003		<u> </u>
Comp	onents (Multimedia) for the Site:					
A.	Final Enforcement Orders, court judger	ments, and consent	decrees of the state of Texas ar	nd the federal government.		
	Effective Date: 08/29/2003	•	ADMINORDER 2002-013	33-PST-E		
			oter C 115.242(9)[G] ctions conspicuously on the front	t of each dispenser equipped v	with a	
	Description: Failure to m vapor recovery system at		oter C 115.246(1) e California Air Resources Board conents installed at the facility.	d Executive Orders for the Sta	ge II	
	Classification: Minor Citation: 30 TAC Ch	apter 115, SubChar	oter C 115.246(3)			
	Description: Failure to m Classification: Minor	aintain a record of r	maintenance conducted on any	part of the Stage II equipment		
	Citation.	apter 115, SubChar aintain a record of t	oter C 115.246(5) the results of testing conducted a	at the facility according to 115	.245.	
	Classification: Moderate					
	Citation: 30 TAC Ch	apter 115, SubChar	• •			
		apter 115, SubChar onduct daily inspect	oter C 115.244(2) ions for the Stage II vapor recov	ery system.		

Classification: Moderate

30 TAC Chapter 115, SubChapter C 115.244(3) Citation:

Description: Failure to conduct a monthly inspection of the components listed in 115.242(3)(J).

Classification: Moderate

30 TAC Chapter 115, SubChapter C 115.245(1)[G]

Description: Failure to successfully complete all applicable tests required in the TNRCC Stage II Vapor Recovery Test Procedure Handbook within 30 days of installation, modification, or major system modification of the Stage II

equipment.

Classification: Minor

30 TAC Chapter 115, SubChapter C 115.248(1)[G]

Description: Failure to ensure at least one facility representative receive training and instruction in the operation and maintenance of the Stage II vapor recovery system by successfully completing a training course approved by the TNRCC.

Classification: Moderate

Citation:

30 TAC Chapter 334, SubChapter A 334.8(c)(4)(B)

Description: Failure to complete an Underground Storage Tank and Self-Certification form with all the applicable

information requested on the agency's authorized form.

Any criminal convictions of the state of Texas and the federal government. B.

N/A

Chronic excessive emissions events. C.

The approval dates of investigations. (CCEDS Inv. Track. No.) D.

> (276002)1 02/25/2003

> 2 08/19/2004 (288058)

3 02/13/2006 (451862)

(510837)5 09/28/2006

(573651)6 09/27/2007

Written notices of violations (NOV). (CCEDS Inv. Track. No.) E.

Date: 02/25/2003

(276002)

Self Report?

30 TAC Chapter 37, SubChapter I 37.815(a)[G]

Citation:

30 TAC Chapter 37, SubChapter I 37.815(b)[G]

Description:

Failure to provide acceptable financial assurance

(451862)Date: 02/13/2006

Self Report?

30 TAC Chapter 115, SubChapter C 115.246(7)(A)

Citation: Description:

Failure to maintain records on-site at facilities ordinarily manned during business hours, and made immediately available for review upon request by authorized representatives of the Texas Commission on Environmental Quality (TCEQ), the U.S. Environmental

Protection Agency (EPA), or any local air pollution control prog

Self Report?

NO

Classification:

Classification:

Classification:

Moderate

Moderate

Moderate

Citation:

30 TAC Chapter 115, SubChapter C 115.245(2)[G]

Description:

Failure to verify proper operation of the Stage II equipment at least once every 12 months or upon major system replacement or modification, whichever occurs first. The verification shall include all functional tests that were required for the initial system test, except for TXP-101 (Vapor Space Manifold), and TXP-103

Self Report?

Classification: Moderate

Citation:

30 TAC Chapter 115, SubChapter C 115.242(3)(A)

Description:

Failure to provide and maintain the Stage II vapor recovery system in proper operating condition, as specified by California Air Resources Board (CARB) Executive Order(s), and free of defects that would impair the effectiveness of the system, including the

absence or disconnection of any component that is a part of the

Environmental audits. F.

Type of environmental management systems (EMSs). G.

Voluntary on-site compliance assessment dates. Η.

N/A

Participation in a voluntary pollution reduction program.

N/A

Early compliance. J.

N/A

Sites Outside of Texas

N/A

# TEXAS COMMISSION ON ENVIRONMENTAL QUALITY



IN THE MATTER OF AN	§	BEFORE THE
ENFORCEMENT ACTION	§	
CONCERNING	§	
INTERGLOBE TRADE CHANNEL,	§	TEXAS COMMISSION ON
INC. AKA F & H STATION, INC.	§	
DBA DOSSANI FOOD MART;	<sub>3</sub> . §	
RN101572444	§	ENVIRONMENTAL QUALITY

# AGREED ORDER DOCKET NO. 2007-1600-PST-E

#### I. JURISDICTION AND STIPULATIONS

At its \_\_\_\_\_\_ agenda, the Texas Commission on Environmental Quality ("Commission" or "TCEQ") considered this agreement of the parties, resolving an enforcement action regarding Interglobe Trade Channel, Inc. aka F & H Station, Inc. dba Dossani Food Mart ("Dossani Food Mart") under the authority of Tex. Water Code chs. 7 and 26 and Tex. Health & Safety Code ch. 382. The Executive Director of the TCEQ, represented by the Litigation Division, and Dossani Food Mart appear before the Commission and together stipulate that:

- 1. Dossani Food Mart owns and operates a convenience store with retail sales of gasoline located at 601 South Denton Drive, Lake Dallas, Denton County, Texas (the "Station).
- 2. This Agreed Order is entered into pursuant to Tex. WATER CODE §§ 7.051 and 7.070. The Commission has jurisdiction of this matter pursuant to Tex. WATER CODE § 5.013 because it alleges violations of Tex. Health & Safety Code ch. 382, Tex. Water Code ch. 26 and TCEO rules.
- 3. The Commission and Dossani Food Mart agree that the Commission has jurisdiction to enter this Agreed Order, and that Dossani Food Mart is subject to the Commission's jurisdiction.
- 4. Dossani Food Mart received notice of the violations alleged in Section II ("Allegations") on or about October 3, 2007.
- 5. The occurrence of any violation is in dispute and the entry of this Agreed Order shall not constitute an admission by Dossani Food Mart of any violation alleged in Section II ("Allegations"), nor of any statute or rule.

- An administrative penalty in the amount of twenty-seven thousand four hundred thirty dollars 6. (\$27,430.00) is assessed by the Commission in settlement of the violations alleged in Section II ("Allegations"). Dossani Food Mart paid nine hundred seventy dollars (\$970.00) of the administrative penalty. The remaining amount of twenty-six thousand four hundred sixty dollars (\$26,460.00) of the administrative penalty shall be payable in 35 monthly payments of seven hundred fifty-six dollars (\$756.00) each, pursuant to 30 Tex. ADMIN. CODE § 70.9(a). The first monthly payment shall be paid within 30 days after the effective date of this Agreed Order. The subsequent payments shall be paid not later than 30 days following the due date of the previous payment. If Dossani Food Mart fails to timely and satisfactorily comply with the payment requirements of this Agreed Order, including the payment schedule, the Executive Director may, at his option, accelerate the maturity of the remaining installments, in which event the unpaid balance shall become immediately due and payable without demand or notice. In addition, Dossani Food Mart's failure to meet the payment schedule of this Agreed Order constitutes the failure by Dossani Food Mart to timely and satisfactorily comply with all of the terms of this Agreed Order.
- 7. Any notice and procedures which might otherwise be authorized or required in this action are waived in the interest of a more timely resolution of the matter.
- 8. The Executive Director of the TCEQ and Dossani Food Mart agreed on a settlement of the matters alleged in this enforcement action, subject to the approval of the Commission.
- 9. The Executive Director recognizes that Dossani Food Mart implemented the following corrective measures at the Station in response to this enforcement action:
  - a. Successfully conducted the required piping tightness and line leak detector tests as of August 24, 2007;
  - b. Submitted an amended registration and obtained a TCEQ delivery certificate on August 24, 2007;
  - c. Provided the TCEQ Dallas/Fort Regional Office Stage II records including a copy of the Stage II daily inspection logs as of September 19, 2007;
  - d. Completed Station representative training, and all current employees received inhouse Stage II vapor recovery training as of September 28, 2007;
  - e. Successfully conducted the required annual testing of the Stage II equipment as of October 11, 2007; and

- f. Upgraded the Stage II equipment to onboard refueling vapor recovery ("ORVR") compatible systems on October 11, 2007.
- 10. The Executive Director may, without further notice or hearing, refer this matter to the Office of the Attorney General of the State of Texas ("OAG") for further enforcement proceedings if the Executive Director determines that Dossani Food Mart has not complied with one or more of the terms or conditions in this Agreed Order.
- 11. This Agreed Order shall terminate five years from its effective date or upon compliance with all the terms and conditions set forth in this Agreed Order, whichever is later.
- 12. The provisions of this Agreed Order are deemed severable and, if a court of competent jurisdiction or other appropriate authority deems any provision of this Agreed Order unenforceable, the remaining provisions shall be valid and enforceable.

#### II. ALLEGATIONS

- 1. During an investigation conducted on August 21, 2007, a TCEQ Dallas/Fort Worth Regional Office investigator documented that Dossani Food Mart violated:
  - a. 30 Tex. ADMIN. Code § 334.50(a)(1)(A), (b)(2), and (b)(2)(A)(i)(III), and Tex. Water Code § 26.3475(a) and (c)(1), by failing to provide a method of release detection capable of detecting a release from any portion of the UST system which contained regulated substances, failing to provide release detection for the piping associated with the USTs, and failing to test the line leak detectors at least once per year for performance and operational reliability;
  - b. 30 Tex. Admin. Code § 334.48(c), by failing to conduct effective manual or automatic inventory control procedures for all USTs involved in the retail sale of petroleum substances used as motor fuel;
  - c. 30 Tex. ADMIN. Code §§ 334.7(d)(3) and 334.8(c)(5)(B)(ii), by failing to provide an amended UST registration to the Commission for any change or additional information regarding USTs within 30 days from the date of the occurrence of the change or addition. Specifically, the Station's UST registration had not been updated to reflect the current owner of the UST system. Also, failing to timely renew a previously issued UST delivery certificate by submitting a properly completed UST registration and self-certification form at least 30 days before the expiration date. Specifically, the Station's delivery certificate expired on April 30, 2007;

- d. 30 TEX. ADMIN. CODE § 334.8(c)(5)(A)(i) and TEX. WATER CODE § 26.3467(a), by failing to make available to a common carrier a valid, current TCEQ delivery certificate before accepting delivery of a regulated substance into the USTs. Specifically, review of the Station's fuel delivery manifests indicated that the Station had received eight deliveries of regulated substance without a delivery certificate;
- e. 30 Tex. Admin. Code § 334.45(c)(3)(A), by failing to install an emergency shutoff valve (shear valve or impact valve) on each pressurized delivery or product line and ensure that it is securely anchored at the base of the dispenser. Specifically, the shear valves underneath all dispensers were not anchored;
- f. 30 Tex. Admin. Code § 334.49(b)(2) and Tex. Water Code § 26.3475(d), by failing to provide corrosion protection to all underground components of an UST system which is designed or used to convey, contain, or store regulated substances. Specifically, there was no corrosion protection installed on the submersible pumps, which were completely full of groundwater;
- g. 30 Tex. Admin. Code § 115.246(6) and Tex. Health & Safety Code § 382.085(b), by failing to maintain Stage II records at the Station and make them available for review upon request by agency personnel. Specifically, the daily inspection records for the Stage II Vapor Recovery System were not available;
- h. 30 Tex. Admin. Code § 115.248(1) and Tex. Health & Safety Code § 382.085(b), by failing to ensure that at least one Station representative received training in the operation and maintenance of the Stage II Vapor Recovery System, and each current employee receives in-house Stage II vapor recovery training regarding the purpose and correct operation of the vapor recovery equipment. Specifically, Stage II training for the Station representative and the employees had not been completed;
- i. 30 Tex. Admin. Code § 115.245(2) and Tex. Health & Safety Code § 382.085(b), by failing to verify proper operation of the Stage II equipment at least once every 12 months. Specifically, the Stage II annual system compliance testing had not been conducted; and
- j. 30 TEX. ADMIN. CODE § 115.242(1)(C) and (9) and TEX. HEALTH & SAFETY CODE § 382.085(b), by failing to upgrade the Stage II equipment to Onboard Refueling Vapor Recovery ("ORVR") compatible systems, and failing to post operating instructions conspicuously on the front of each gasoline dispensing pump.

#### III. DENIALS

Dossani Food Mart generally denies each allegation in Section II ("Allegations").

#### IV. ORDERING PROVISIONS

1. It is, therefore, ordered by the TCEQ that Dossani Food Mart pay an administrative penalty as set forth in Section I, Paragraph 6 above. The payment of this administrative penalty and Dossani Food Mart's compliance with all the terms and conditions set forth in this Agreed Order resolve only the allegations in Section II. The Commission shall not be constrained in any manner from considering or requiring corrective action or penalties for violations which are not raised here. Administrative penalty payments shall be made payable to "Texas Commission on Environmental Quality" and shall be sent with the notation "Re: Interglobe Trade Channel, Inc. aka F & H Station, Inc. dba Dossani Food Mart, Docket No. 2007-1600-PST-E" to:

Financial Administration Division, Revenues Section Attention: Cashier's Office, MC 214 Texas Commission on Environmental Quality P.O. Box 13088 Austin, Texas 78711-3088

- 2. Dossani Food Mart shall undertake the following technical requirements:
  - a. Immediately upon the effective date of this Agreed Order, Dossani Food Mart shall:
    - i. Begin conducting effective manual or automatic inventory control procedures for all USTs, in accordance with 30 Tex. ADMIN. CODE § 334.48; and
    - ii. Ensure shear valves are installed and securely anchored at the base of each dispenser, in accordance with 30 Tex. ADMIN. CODE § 334.45.
  - b. Within 30 days after the effective date of this Agreed Order, Dossani Food Mart shall:
    - i. Implement a release detection method for all USTs at the Station, in accordance with 30 Tex. ADMIN. CODE § 334.50;

- ii. Ensure that corrosion protection is in place for all underground components of the underground UST system, in accordance with 30 Tex. ADMIN. CODE § 334.49; and
- iii. Begin maintaining the Stage II vapor recovery system in proper operating condition, this shall include post operating instructions at each fueling point, in accordance with 30 Tex. ADMIN. CODE § 115.242.
- c. Within 45 days after the effective date of this Agreed Order, Dossani Food Mart shall submit written certification and detailed supporting documentation, including photographs, receipts, and /or other records, to demonstrate compliance with Ordering Provisions 2.a. and 2.b. above. The certification shall be notarized by a State of Texas Notary Public and include the following certification language:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Dossani Food Mart shall submit the written certification and copies of documentation necessary to demonstrate compliance with Ordering Provisions 2.a. and 2.b. above to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Sam Barrett, Waste Section Manager Dallas-Fort Worth Regional Office Texas Commission on Environmental Quality 2309 Gravel Drive Fort Worth, Texas 76118-6951

- 3. The provisions of this Agreed Order shall apply to and be binding upon Dossani Food Mart. Dossani Food Mart is ordered to give notice of the Agreed Order to personnel who maintain day-to-day control over the Station operations referenced in this Agreed Order.
- 4. If Dossani Food Mart fails to comply with any of the Ordering Provisions in this Agreed Order within the prescribed schedules, and that failure is caused solely by an act of God, war, strike, riot, or other catastrophe, Dossani Food Mart's failure to comply is not a violation of this Agreed Order. Dossani Food Mart shall have the burden of establishing to the Executive Director's satisfaction that such an event has occurred. Dossani Food Mart shall notify the Executive Director within seven days after Dossani Food Mart becomes aware of a delaying event and shall take all reasonable measures to mitigate and minimize any delay.
- 5. The Executive Director may grant an extension of any deadline in this Agreed Order or in any plan, report, or other document submitted pursuant to this Agreed Order, upon a written and substantiated showing of good cause. All requests for extensions by Dossani Food Mart shall be made in writing to the Executive Director. Extensions are not effective until Dossani Food Mart receives written approval from the Executive Director. The determination of what constitutes good cause rests solely with the Executive Director.
- 6. This Agreed Order, issued by the Commission, shall not be admissible against Dossani Food Mart in a civil proceeding, unless the proceeding is brought by the OAG to: (1) enforce the terms of this Agreed Order; or (2) pursue violations of a statute within the Commission's jurisdiction, or of a rule adopted or an order or permit issued by the Commission under such a statute.
- 7. This Agreed Order may be executed in multiple counterparts, which together shall constitute a single original instrument. Any executed signature page to this Agreed Order may be transmitted by facsimile transmission to the other parties, which shall constitute an original signature for all purposes.

8. Under 30 Tex. Admin. Code § 70.10(b) and Tex. Gov't Code § 2001.142, the effective date of this Agreed Order is the date of hand-delivery of the Agreed Order to Dossani Food Mart, or three days after the date on which the Commission mails notice of this Agreed Order to Dossani Food Mart, whichever is earlier. The Chief Clerk shall provide a copy of this Agreed Order to each of the parties.

#### SIGNATURE PAGE

TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

For the Commission		
Herkon Penlue	\$ 9/2/2009	
For the Executive Director	Date	

I, the undersigned, have read and understand the attached Agreed Order. I represent that I am authorized to agree to the attached Agreed Order on behalf of the entity, if any, indicated below my signature, and I do agree to the terms and conditions specified therein. I further acknowledge that the TCEQ, in accepting payment for the penalty amount, is materially relying on such representation.

I also understand that my failure to comply with the Ordering Provisions, if any, in this order and/or my failure to timely pay the penalty amount, may result in:

- A negative impact on Dossani Food Mart's compliance history;
- Greater scrutiny of any permit applications submitted by Dossani Food Mart;
- Referral of this case to the Attorney General's office for contempt, injunctive relief, additional penalties, and/or attorney fees, or to a collection agency;
- Increased penalties in any future enforcement actions against Dossani Food Mart,
- Automatic referral to the Attorney General's Office of any future enforcement actions against Dossani Food Mart; and
- TCEO seeking other relief as authorized by law.

In addition, any falsification of any compliance documents may result in criminal prosecution.

faisal Dossani

dba Dossani Food Mart

Name (Printed or typed) Authorized representative of Interglobe Trade Channel, Inc. aka F & H Station, Inc.

7-21-09 Date PRESIDENT.